



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID TIEU and
CHANDA EL,
aka "Sai Gotham,"

Defendants.

ED CR No. **5:23-cr-00036-SSS**

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy; 18
U.S.C. § 2113(a): Bank Burglary;
18 U.S.C. § 2(a): Aiding and
Abetting]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on or about an unknown date, and continuing to on or about February 18, 2023, in San Bernardino County, within the Central District of California, defendants DAVID TIEU and CHANDA EL, also known as "Sai Gotham," knowingly conspired and agreed with each other to commit bank burglary and theft of bank property, in violation of Title 18, United States Code, Sections 2113(a) and (b).

1 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
2 ACCOMPLISHED

3 The objects of the conspiracy were to be accomplished, in
4 substance, as follows:

5 1. Defendants TIEU and EL would break into a Bank of America
6 Automatic Teller Machine ("ATM") maintenance site located at 6331
7 Haven Avenue, Suite 13, Rancho Cucamonga, California and cut power to
8 the site's surveillance system and alarm panel in preparation for
9 later removing money from the ATMs at that location.

10 2. Defendants TIEU and EL would set up surveillance equipment
11 of the ATM maintenance site location to monitor activity at the
12 location.

13 3. Defendants TIEU and EL would return to the ATM maintenance
14 site to steal and purloin property, money, and things of value from
15 the ATMs at the ATM maintenance site.

16 C. OVERT ACTS

17 In furtherance of the conspiracy, and to accomplish the objects
18 of the conspiracy, on or about the following dates, defendants TIEU
19 and EL committed various overt acts within the Central District of
20 California, and elsewhere, including, but not limited to, the
21 following:

22 Overt Act No. 1: On or about February 18, 2023, at
23 approximately 6:00 p.m., defendants TIEU and EL cut a hole in the
24 roof of a Bank of America ATM maintenance site located at 6331 Haven
25 Avenue, Suite 13, Rancho Cucamonga, California and thereafter cut
26 power to the ATM site's surveillance system and alarm panel.

27 Overt Act No. 2: On or about February 18, 2023, defendants
28 TIEU and EL placed a wireless security camera outside the Bank of

1 America ATM maintenance site located at 6331 Haven Avenue, Suite 13,
2 Rancho Cucamonga, California to monitor activity at the ATM
3 maintenance site.

4 Overt Act No. 3: On or about February 18, 2023, at
5 approximately 11:00 p.m., defendants TIEU and EL returned and broke
6 into the Bank of America ATM maintenance site located at 6331 Haven
7 Avenue, Suite 13, Rancho Cucamonga, California for a second time and
8 took approximately \$87,315 belonging to and in the care, custody,
9 management, and possession of Bank of America.

10 Overt Act No. 4: On or about February 18, 2023, defendants
11 TIEU and EL hid in the bathroom of the Bank of America ATM
12 maintenance site located at 6331 Haven Avenue, Suite 13, Rancho
13 Cucamonga and then refused to exit the bathroom after law enforcement
14 officers entered the ATM maintenance site and called for defendants
15 TIEU and EL to exit the bathroom.

16 Overt Act No. 5: On or about February 18, 2023, defendant EL
17 provided the false name of "Sai Gotham" to responding officers to
18 prevent investigators from discovering his identity.

COUNT TWO

[18 U.S.C. §§ 2113(a), 2(a)]

[ALL DEFENDANTS]

On or about February 18, 2023, at approximately 6:00 p.m., in San Bernardino County, within the Central District of California, defendants DAVID TIEU and CHANDA EL, also known as "Sai Gotham," each aiding and abetting the other, entered a Bank of America Automatic Teller Machine maintenance site located at 6331 Haven Avenue, Suite 13, Rancho Cucamonga, California, with the intent to commit a felony larceny, in violation of Title 18, United States Code, Section 2113(b), affecting Bank of America, a bank the deposits of which were then insured by the Federal Deposit Insurance Corporation.

COUNT THREE

[18 U.S.C. §§ 2113(a), 2(a)]

[ALL DEFENDANTS]

On or about February 18, 2023, at approximately 11:00 p.m., in San Bernardino County, within the Central District of California, defendants DAVID TIEU and CHANDA EL, also known as "Sai Gotham," each aiding and abetting the other, entered a Bank of America Automatic Teller Machine maintenance site located at 6331 Haven Avenue, Suite 13, Rancho Cucamonga, California, with the intent to commit a felony larceny, in violation of Title 18, United States Code, Section 2113(b), affecting Bank of America, a bank the deposits of which were then insured by the Federal Deposit Insurance Corporation.

A TRUE BILL



Foreperson

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